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Via Email

July 20, 2015

Honorable Michael E. Wiles
United States Bankruptcy Court
One Bowling Green
New York, New York 10004

Re: Thelen LLP, Debtor Case No. 09-15631 (MEW)

Your Honor,

I am the chapter 7 trustee of the estate of Thelen LLP. This letter is in response to Mr. Heuer's letter of today's date, filed on behalf of Frederick Cohen, requesting an adjournment of the hearing on the WARN claim settlement that is scheduled for tomorrow.

Mr. Cohen first reached out to my counsel on June 23rd requesting an adjournment of the hearing. At that time, I advised Mr. Cohen that the settlement at issue relates to the priority wage claims of Thelen's former employees and did not impact him directly, except insofar as he may have a claim against the estate. I further advised that, while I generally try to accommodate adjournment requests when circumstances warrant, the motion was served on over 1,400 parties and, thus, cannot be adjourned based solely on one party's request. At that time, I suggested that Mr. Cohen could reach out to Chambers and request to appear telephonically or he could arrange to have counsel appear on his behalf.

Last week, on July 15th, Mr. Heuer reached out to me to renew Mr. Cohen's request for an adjournment of the hearing. Once again, I responded that I work hard to accommodate all scheduling requests from parties, and work collegially with all members of the bar, but, in this instance, I was compelled to deny the request for the following reasons: (i) over a thousand parties were served notice of the motion, and while no one other than Mr. Cohen has objected, we do not know who will attend, including possibly former employees who are directly affected by the motion, (ii) Mr. Cohen can appear by counsel, (iii) Mr. Cohen

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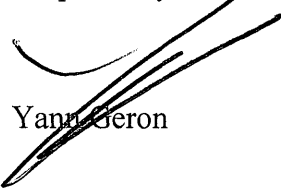
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can change his travel schedule, (iv) Mr. Cohen can argue his objection by telephonic appearance, and (v) California counsel to the WARN class may have made plans to appear at the hearing in person as they told me they would be doing this some time ago¹.

Additionally, the hearing on the WARN claim settlement was coordinated with other hearings in the Thelen case so as to reduce the overall administrative costs.

In light of the foregoing, I respectfully request that the hearing on the WARN claim settlement proceed tomorrow as originally scheduled.

Respectfully,



Yann Geron

YG:nns

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¹ We have since confirmed with California WARN counsel that Craig Collins, Esq. has made plans to attend tomorrow's hearing in person.